## RABINOWITZ, BOUDIN, STANDARD, KRINSKY & L ATTORNEYS AT LAW

111 BROADWAY, ELEVENTH FLOOR NEW YORK, NY 10006-1901

TELEPHONE (212) 254-1111

FACSIMILE (212) 674-4614

www.rbskl.com

USDC SUNY
PROCUMENT
CTRONICAL

#:
JUN 0 2 2008

LEONARD I WEINGLASS DÉBRA EVENSON TERRY GROSS CRAIG KAPLAN

COUNSEL

LINDSEY FRANK

MICHAEL KRINSKY

ERIC M LIEBERMAN DAVID B. GOLDSTEIN CHRISTOPHER J. KLATELL

VICTOR RABINOWITZ (1911-2007)

LEONARD B. BOUDIN (1912-1989)

MICHAEL KRINSKY 212 254 1111 Ext. 102 mkrinsky@rbskl.com

June 2, 2008

By FAX to (212) 805-0426

Honorable Laura Taylor Swain United States District Court United States Courthouse 500 Pearl Street New York, New York 10007

MEMO ENDORSED

Re: E.T.I. Euro Telecom International N.V. v. Republic of Bolivia and Empresa Nacional de Telecomunicaciones Entel S.A., Civil Action No. 08-CV-4247 (LTS)

Dear Judge Swain:

On behalf of Empresa Nacional de Telecomunicaciones Entel S.A. ("Entel"), we respectfully request that Entel be allowed until no later than June 11, 2008 to file its papers, now due June 3, in opposition to plaintiff's motion to confirm ex parte orders of attachment. We have been authorized to represent that the Republic of Bolivia consents, and proposes to file its papers on the same day as Entel.

Counsel for plaintiff has authorized us to represent that it consents to this extension of time, provided that it be allowed until June 19, 2008 to file its reply papers, which are currently due June 9. Entel and, we are authorized to represent, the Republic of Bolivia consents to this extension.

Entel was prepared to file its papers later this week (although not by June 3), but counsel for plaintiff has advised that Entel's filing anytime after June 3 would necessitate plaintiff seeking a due date of June 19 for its reply papers in any event, on account of the lead attorneys for plaintiff being out of New York on business for the entire week of June 9<sup>th</sup>.

Honorable Laura Taylor Swain May 30, 2008 Page 2

Entel is a Bolivian telephone company with offices in La Paz, Bolivia. Entel first received the Court's ex parte order of attachment and the instant motion to confirm attachments in La Paz on May 19, 2008 by Federal Express delivery. Counsel for Entel has worked diligently to prepare Entel's papers in opposition and originally hoped to be able to do so by June 3, ten business days after Entel's receipt of the papers. However, the need to send counsel to La Paz to confer with the client and obtain the relevant information has delayed matters slightly, and necessitates this request.

In compliance with the Court's Individual Practice Rule, we state as follows:

- 1. In Entel's view, its papers in opposition were originally due this Tuesday, June 3, under the Court's order. Plaintiff has maintained that Entel's papers were due May 30 under the Court's order. Rather than burden the Court with this dispute, the parties submitted a stipulation for the Court's approval setting June 3 as the time for Entel and the Republic of Bolivia to file their opposition papers and June 9 as the time for plaintiff to file its papers in reply. The stipulation was submitted expressly without prejudice to the parties' positions as to the original due dates. The Court has not, as far as counsel is aware, acted on the submitted stipulation.
- 2. Except insofar as the foregoing may be considered a request for extension of time, there have been no previous requests for extensions of time.

The requested adjournment does not affect any other scheduled dates.

Respectfully submitted.

Michael Krinsky

cc: Robert L. Sills Steven J. Fink

Orrick, Herrington & Sutcliffe LLP

Counsel for Plaintiff

By FAX to (212) 506-5151

SO ORDERED.

LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE